

[NOT CURRENTLY SCHEDULED FOR A HEARING]

UNITED STATES COURT OF APPEALS
DISTRICT OF COLUMBIA CIRCUIT

National Security
Counselors, Inc.,

Appellant,

v.

Central Intelligence Agency, *et al.*

Appellees.

* * * * *

Case No. 14-5171

APPELLANT’S CONSENT MOTION FOR EXTENSION OF TIME
TO FILE REPLY BRIEF

Appellant National Security Counselors, Inc. (“NSC”), by and through the undersigned, respectfully seeks leave of this Court for a two week extension of its deadline to file its reply brief. NSC is seeking to postpone its deadline until April 13, 2015. The Appellees have consented to the request.

In accordance with the current briefing schedule, the Appellees filed their opposition brief on March 16, 2015 and NSC is due to file its reply brief on March 30, 2015. In their brief, the Appellees raised several arguments that had not been previously addressed and which NSC had not anticipated being at issue. NSC is requesting this additional time in order to investigate the legal arguments in depth and ultimately ensure that the record before the Court is complete and comprehensive.

This request has been made in good faith and granting it will neither prejudice the Appellees nor materially delay this Court's ability to resolve this case.

For the foregoing reasons, the Court should grant NSC's Motion for an Extension of Time to File its Reply Brief and set the new deadline for April 13, 2015.

Date: March 18, 2015

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2015, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will send notice of such filing to all attorneys of record in this matter.

/s/

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